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Lorri Guastella, President

May 6, 1993

MAY 7 1903

Maria McDonald, Vice President

Office of the Secretary

FCC MAIL BEAM 24

Jan Ross, Secretary

Room 222

1919 M Street NW Washington, DC 20554

Terri Agress, Treasurer

RE: Children's TV MM Docket No. 93-48

Federal Communications Commission

Dear Sir/Madam:

The South Florida Preschool PTA is an organization for mothers of young children from infancy to age 5.

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

A CHILDREN'S TELEVISION ACT OF 1990 MONITORING

REPORT OF SOUTH FLORIDA COMMERCIAL

TELEVISION STATIONS

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MAY 7 1003

FCC MAIL BRANCH

Prepared by
Linda L. Schwartz, Legislative Committee Chairperson
South Florida Preschool PTA

May 5, 1993

South Florida Preschool PTA:
Lorri Guastella,
President
Maria Domenech Mc, Donald,
Vice President,
Dade County Council PTA/PTSA
Preschool Education Chair
Linda L. Schwartz,
Legislative Committee Chairperson

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MAY - 7 1993

A priority of the National PTA for almost 20 years has proper RETARY improving the quality of children's television programming. The National PTA was one of the organizations lobbying in support of the Children's Television Act of 1990 (Public Law 101-437).

The Childrenic Television act actablishes rules_in_two major

programming and the educational value of the children's shows aired on these two stations existed and was not a question. As well, cable stations were not monitored because 1) programming review requirements required by the Act do not apply to cable, or noncommercial, stations; 3 and 2) viewers pay for cable television and if they are not happy with its content, including its educational/informational children's programming, patrons can cancel their subscriptions.

Our monitoring concentrated only on the four above stations whose airwaves are of sufficient strength that any home in South Florida with a television receives them.

Initially, the television guide was examined to eliminate programs that clearly were not children's programs. The Children's Television Act defines children's programs as those with a target audience under 16 years old. The remaining time slots were monitored by individual SFPPTA members who signed up to watch one (1) hour blocks of television on each of the four stations. During each hour of monitoring members ascertained 1) if the program(s) was a children's program, 2) if a children's program, was it educational or informational, and 3) the number of minutes of commercials aired was timed and recorded.

Once the children's programs timeslots were determined, all of these programs were viewed by a second member of the SFPPTA in order to provide greater validity to the assigning of an "educational/informational" label versus strictly entertainment programs.

In addition, the Programming Directors for each of the four stations were contacted, advised of our monitoring project and interviewed as to what children's programs the station classified as educational/informational.

FINDINGS

Each of the four monitored stations airs a 168 hour broadcast week. In all four cases, all regular children's programming takes place on Saturday mornings. No regular children's programming airs weekdays or on Sundays.

Children's program airtime on Saturdays ranges from 2 to 6 hours on these stations and airs between 6:00 a.m. and 1:00 p.m. Educational/informational programming comprised only one-half (0.5) hour of that total children's programming on

³FCC Report and Order, MM Docket No. 90-570, 83-670 (April 1991) ⁴Children's Television Act of 1990, Pub. L. No. 101-437, 101st Cong., 1st Sess.

three of the stations and one and one-half (1.5) hours on one station. Following is the four station's respective children's television and children's educational television airtimes:

Channel	Total Children's Airtime ⁺⁺	Total Children's Educ/Info Airtime
4	2 hours	0.5 hours
6	5.5	0.5
7	6	0.5
10	5.5	1.5

1. Overall, South Florida television stations are not making a serious effort to adequately serve the educational needs of children with less than 1% of programming being educational children's TV.

The SFPPTA monitoring showed that less than 4% of each of the four station's 168 hour broadcast week is devoted to children's programming and that less than 25% of that 4%, or less than 1% of the station's overall weekly programming is what we classified as educational/informational children's television. These results are charted on Schedule 1, attached.

Children's shows, in our surveyor's opinions, were geared more for school aged children than preschool age children. This same older than preschool age audience (estimated as being preteen to early teen for most of the programs) was the target of the educational/informational programming. Preschoolers, who are "ready to learn" would benefit from the intent of the Act though we found educational/informational programming aimed at them to be seriously lacking, if not almost nonexistent.

^{*+*}Channel 7 airs one hour of children's entertainment cartoon programming from 5 to 6:00a.m. some weeks; however, according to the weekly Television Guide this timeslot is often preempted by two full one-half hour length adult oriented commercials. Channel 10 airs a one-half hour educational/informational children's program called "Scratch" at 1:00p.m. some weeks, but it too is often preempted. During the three weeks these stations were monitored by SFPPTA these timeslots were preempted; therefore, the additional children's programming time for each station is not included in our results as their airtime is inconsistent

Schedule 2, attached, lists the children's programming shown weekly on each of the four stations monitored. Schedule 3, also attached, lists the children's programs that the SFPPTA monitoring members classified as educational/informational versus the children's programs that the stations classified as educational/informational.

Reactions from the stations regarding our monitoring and the purpose for same was mixed. Channel 4 provided us a written report of their last quarter's educational/informational children's television efforts and met with us to discuss our findings. They were seemingly receptive to our suggestions regarding improving children's television fare.

Channel 6 willingly provided us with a written report of their "informational" programming for the last 6 weeks as well as their most recent Certification of Compliance with the Children's Television Commercial Limits but went no further.

Channel 7, the Fox Independent, expressed no interest in our monitoring or its purpose but simply verbally advised us that they classified the same one-half hour program, out of their six hours of children's programming, as educational as did our surveyors.

Channel 10, the ABC affiliate, was also disinterested in our work, and discussed it only to the extent they agreed with our findings as to their station's educational/informational programming, 1.5 hours of the 5.5 hour block being educational/informational. However, they added an additional half-hour show to their educational/informational list that did not air any of the three weeks their station was viewed by our surveyors. The station's Program Director admitted that show is often preempted by the network. On the weeks we viewed, it was preempted by a bowling tournament and twice by syndicated segments of the adult drama "Beauty and the Beast".

2. Stations classify pro-social themed entertainment programs as educational to meet the law's programming requirements, not serving the informational needs of children.

Channel 4, the NBC owned and operated station, who we found to air only 2 hours per week total children's television with only one-half hour of that being classified educational/informational, classified 1 hour more of their children's programming as educational than did our surveyors. SFPPTA surveyors felt that such shows as "Saved By The Bell" and "California Dreams", that Channel 4 cited as educational, were dramatic enactments of a social issue; and that while it might have informational value, the show

would be viewed by its pre/early-teen audience as entertainment and not its educational "message" value.

The SFPPTA surveyors classified shows as educational/informational only if their primary intent was to educate, not entertainment shows that contained a social theme.

Channel 6, the CBS owned station, agreed with our findings that only one weekly one-half hour program in their 5.5 hours of regular weekly children's programming can be classified as educational/informational.

In a written report of their "informational" programming for the weeks of March 8 through April 12, 1993, they listed quarterly educational/informational specials. Though none were aired during our monitoring period, network provided quarterly specials are also aired and classified as educational/informational. The descriptions of the afternoon specials appeared to deal with emotional/social issues for teenagers and preteens. The FCC defines such programming as educational/informational if it "furthers the positive development of the child in any respect, including the child's cognitive/intellectual or emotional/social needs."6 did not, however, meet our educational/informational children's programming requirements of being primarily educational, instead of dramatizations of social issues.

We fear stations are taking the easy way out, grasping upon the second part of the FCC definition and focusing most of their attention on social needs rather than serving the cognitive/intellectual needs of our children.

3. Ten to 60 second PSAs/vignettes are being used to fulfill the educational/informational requirements of the law.

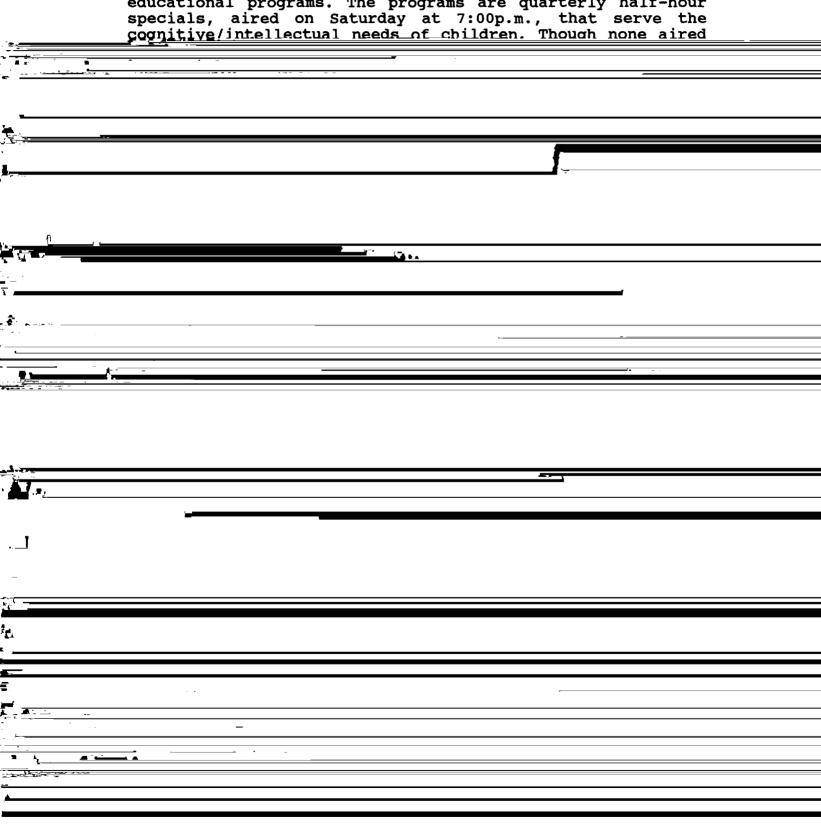
Throughout their broadcast day and week Channel 4 airs a series of 10 to 60 second spots called "Do The Right Thing" and "The More You Know." They categorize these "vignettes" as part of their educational/informational children's programming. Channel 6 airs 30 second spots entitled "Reading Buddies", "Turtle Tips", and "What's on Your Plate?" They too classify these short segments as educational/informational. The SFPPTA classified these spots as Public Service Announcements during our monitoring; however, much to our chagrin, the Act does count these "vignettes" as part of a station's educational/informational programming.

⁶ August Order 6 FCC Rcd at 5099.

FCC Report and Order, MM Docket No. 90-570, 83-670 (April 1991)

4. Only one of the four stations air locally produced programs designed to serve the educational/informational needs of children.

Our study found that of the four major local commercial stations, only *Channel 4* broadcasts any locally produced educational programs. The programs are quarterly half-hour specials, aired on Saturday at 7:00p.m., that serve the cognitive/intellectual needs of children. Though none aired



7. Stations operate within commercial limits guideline set by the Act.

Monitoring did find that each of the four stations stays within the commercial time limit guidelines set by the Children's Television Act of 1990, with none airing more than 10.5 minutes of commercials per hour during their respective Saturday morning children's television blocks.

The majority of commercials, however, advertised toys, sugary cereals, candy and sugary drinks such as Koolaid. Surveyors all noted the fast pace, bright colors and loudness of the commercials often in contrast to the shows during which they were aired thus making them "sure attention grabbers."

RECOMMENDATIONS

Members of the South Florida Preschool PTA have been appalled and distressed by the results of our survey that show that less than 1% of the 168 hour broadcast week of the four commercial stations that we monitored is educational/informational children's programming. As well, we have been disturbed by an unexpected discovery during our monitoring, that being the excessive amount of violence in children's television. The number of violent acts per hour shown on broadcast station's children's programming is eight times greater than the number of violent acts shown during those station's general programming and almost twice that on cable television children's programs.

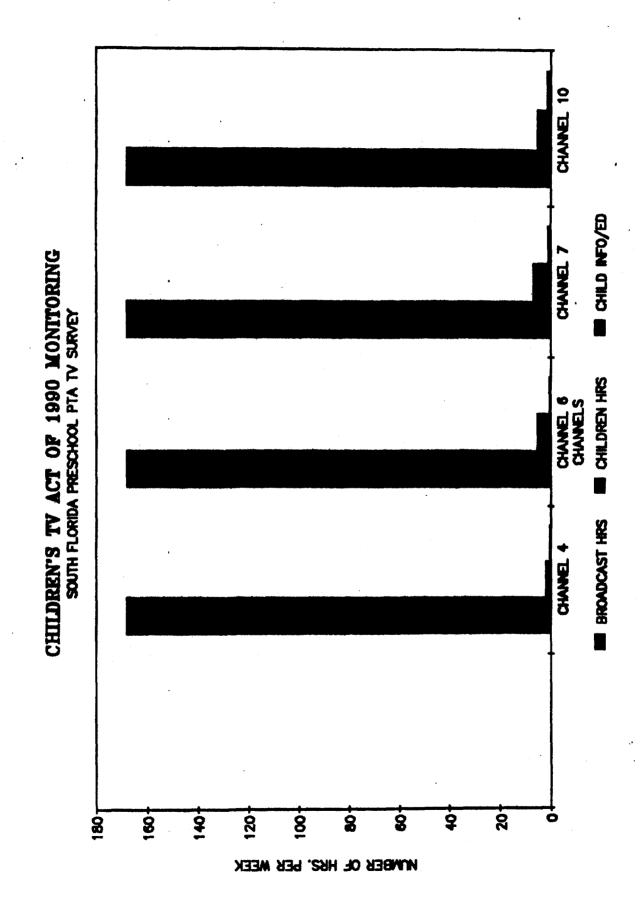
Our goal is to work to increase the amount of educational/informational children's television in South Florida and decrease its propensity for violence, and to encourage other parents, educators and civic leaders in South Florida and throughout the state to join with our effort.

The South Florida Preschool PTA, based on the findings of our monitoring (which will continue throughout the current license period) makes the following recommendations:

1. The Children's Television Act should be made more definitive as to its definition of educational/informational children's programming. It is currently very definitive as to commercial limits but not as to programming. The Act's definition of educational/informational should be stated such that programs so classified clearly impart some form

^{9&}quot;Kid's TV more of a wasteland than ever, critics say," The Miami Herald, May 3, 1993.

of learning or information, so that there is no means by which shows can be construed as educational or informational



SCHEDULE 2

SOUTH FLORIDA CHILDREN'S PUBLIC BROADCAST PROGRAMS

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CHANNEL 4
Sat., 10:00a.m. - Saved By the Bell
            10:30a.m. - California Dreams
11:00a.m. - Saved by the Bell
            11:30a.m. - Name Your Adventure
CHANNEL 6
Sat., 7:30a.m. - Peppermint Place
8:00a.m. - Fievel's American Tails
8:30a.m. - The Little Mermaid
            9:00a.m. - Garfield and Friends
10:00a.m. - Teenage Mutant Ninja Turtles
11:00a.m. - Cyber Cops
11:30a.m. - Raw Toonage
12:00p.m. - Amazing Live Sea Monkeys
12:30p.m. - Back to the Future
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CHANNEL 7

Sat., 5:00a.m. - T-Rex * 5:30a.m. - Yo, Yogi! * 6:00a.m. - Don Coyote and Sancho Panda 6:30a.m. - Young Robin Hood 7:00a.m. - Pirates of Dark Water 7:30a.m. - Pirates of Dark Water
7:30a.m. - Not Just News
8:00a.m. - Dog City
8:30a.m. - Bobby's World
9:00a.m. - Tom and Jerry Kids
9:30a.m. - Eek! the Cat
10:00a.m. - Tiny Toon Adventures
10:30a.m. - Taz-Mania

11:00am. - X-Men

11:30a.m. - Super Dave

CHANNEL 10

Sat., 7:30a.m. - Zoo Life With Jack Hanna 8:00a.m. - A Pup Named Scooby Doo 8:00a.m. - A Pup Named Scoopy Doo
8:30a.m. - Wild West C.O.W. Boys of Moo Mesa
9:00a.m. - Goof Troop
9:30a.m. - The Addams Family
10:00a.m. - Bugs Bunny and Tweety
11:00a.m. - Land of the Lost
11:30a.m. - Darkwing Duck
12:00p.m. - Beakman's World
12:30p.m. - By Kids for Kids 1:00p.m. - Scratch *

* These programs are preempted 50 to 75% of the time. Times are not included in monitoring report as they were preempted during the monitoring time frame.

SCHEDULE 3

SFPPTA RANKED EDUCATIONAL PROGRAMS VS. STATION RANKED EDUCATIONAL PROGRAMS

SFPPTA

STATION

CHANNEL 4

Name Your Adventure

Saved By the Bell California Dreams Saved by the Bell Name Your Adventure

"Do the Right Thing" spots
"The More You Know" spots

Quarterly Specials

CHANNEL 6

Peppermint Place

Peppermint Place

"Reading Buddy" spots "Turtle Tips" spots

"What's On Your Plate" spots

Quarterly Specials

CHANNEL 7

Not Just the News

Not Just the News

CHANNEL 10

Beakman's World By Kids For Kids

Zoolife With Jack Hanna Zoolife With Jack Hanna

Beakman's World By Kids For Kids

Scratch